

1 Robert Ottinger (SBN 156825)
Ori Edelstein (SBN 268145)
2 THE OTTINGER FIRM, P.C.
930 Montgomery Street, #502
3 San Francisco, CA 94133
415-262-0096
4 Fax: (415) 520-0555
Email: robert@ottingerlaw.com
5 Email: ori@ottingerlaw.com

6 Attorneys for Plaintiffs
7 Deanne Echevarria, Robin Gail Hayes, and for
the proposed class
8

9 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 DEANNE ECHEVARRIA, ROBIN
12 GAIL HAYES, individually and on
behalf of all others similarly situated, and
13 other aggrieved employees under the
Labor Code Private Attorneys General
14 Act of 2004

15 Plaintiffs,

16 vs.

17 ACCENTCARE, INC., ACCENTCARE
OF CALIFORNIA, INC., and DOES 1-
18 50,

19 Defendants.

Case No. 3:15-cv-00676-EDL

HON. ELIZABETH D. LAPORTE

**NOTICE OF VOLUNTARY
DISMISSAL WITHOUT
PREJUDICE**

1 **TO THE HONORABLE COURT, ALL PARTIES HEREIN AND THEIR**
2 **RESPECTIVE COUNSEL OF RECORD:**

3 Plaintiffs Deanne Echecarria and Robin Gail Hayes by their counsel, the
4 Ottinger Firm, hereby voluntarily dismiss this lawsuit pursuant to Federal Rule of
5 Civil Procedure 41(a).

6 Plaintiffs filed this action in the Superior Court for the State of California,
7 County of Alameda on January 7, 2015. Defendants removed the action to this
8 court on February 12, 2015. Defendants then moved to compel arbitration on
9 February 19, 2015. This case was filed as a class action, however, no class has
10 been certified. Defendants have not served an answer or a motion for summary
11 judgment.

12 Such dismissal shall be without prejudice, with each side to bear its own
13 costs and fees.

14
15 Respectfully submitted,

16
17 Dated: March 5, 2015

THE OTTINGER FIRM, P.C.

18
19 BY: /s/ Ori Edelstein
20 ROBERT OTTINGER
21 ORI EDELSTEIN

22 Attorneys for Plaintiffs
23 Deanne Echevarria, Robin Gail Hayes,
24 and for the Putative Class
25
26
27
28